

PETER HSIAO (Bar No. 119881)
phsiao@kslaw.com
ALEXANDER MOORE (Bar No. 340994)
amoore@kslaw.com
KING & SPALDING LLP
50 California Street, Suite 3300
San Francisco, CA 94111
Telephone: +1 415 318-1200
Facsimile: +1 415 318 1300

Attorneys for Defendants
TRAVIS MOREDA DAIRY and TRAVIS
MOREDA

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA**

CALIFORNIANS FOR ALTERNATIVES TO TOXICS

Plaintiff,

VS.

**TRAVIS MOREDA DAIRY and TRAVIS
MOREDA,**

Defendants.

Case No. 3:24-CV-06632-SI

**DECLARATION OF ALEXANDER
MOORE IN SUPPORT OF
DEFENDANTS' MOTION TO DISMISS
OR, IN THE ALTERNATIVE, MOTION
FOR SUMMARY JUDGMENT**

[Filed concurrently with Notice of Motion and Motion, Declarations of Travis Moreda and Kyle Lutz, and [Proposed] Order]

*Assigned for all purposes to the
Honorable Susan Illston*

1 **DECLARATION OF ALEXANDER MOORE**

2 I, Alexander Moore, declare and state as follows:

3 1. I am an associate at King & Spalding LLP and am licensed to practice
4 law in the State of California. I represent Travis Moreda and Travis Moreda Dairy
5 (collectively, “Travis”) in the above-captioned matter. I have personal knowledge
6 of the facts set forth herein, and if called as a witness I could and would competently
7 testify thereto.

8 2. Attached as **Exhibit G** is a true and correct copy of Plaintiff’s Rule 26
9 Initial Disclosures, dated April 4, 2025.

10 3. Attached as **Exhibit H** is a true and correct copy of Travis’ Rule 26
11 Initial Disclosures, dated April 4, 2025.

12 I declare under penalty of perjury under the laws of the United States of
13 America that the foregoing is true and correct.

14 Executed this 26th day of September 2025, in Oakland, California.

15
16 
17 _____
18 Alexander Moore

EXHIBIT G

1 WILLIAM VERICK (State Bar No. 140972)
 2 Klamath Environmental Law Center
 P.O. Box 1128
 3 Arcata, CA 95518
 (707) 630-5061
 wverick@igc.org

4 DAVID WILLIAMS (State Bar No. 144479)
 5 Law Offices of David Williams
 1839 Ygnacio Valley Road, Suite 351
 Walnut Creek, CA 94598
 6 (510) 847-2356
 dhwill7@gmail.com

7 BRIAN ACREE (State Bar No. 202505)
 8 Law Office of Brian Acree
 9 95 3rd Street, Second Floor
 San Francisco, CA 94103-3103
 (510) 517-5196
 brian@brianacree.com

10 WILLIAM N. CARLON (State Bar No. 305739)
 11 Law Office of William Carlon
 12 437 Post Street
 Napa, CA 94559
 13 (530) 514-4115
 william@carlonlaw.com

14 Attorneys for Plaintiff
 15 CALIFORNIANS FOR
 ALTERNATIVES TO TOXICS

16 **UNITED STATES DISTRICT COURT**

17 **NORTHERN DISTRICT OF CALIFORNIA**

18 CALIFORNIANS FOR ALTERNATIVES
 19 TO TOXICS,

Case No. 3:24-cv-06632-SI

20 Plaintiff,

PLAINTIFF'S INITIAL DISCLOSURES
FRCP 26(a)(1)(A) & (B)

21 vs.

22 TRAVIS MOREDA DAIRY and TRAVIS
 MOREDA,

23 Defendants.

24 Pursuant to F.R.C.P. 26(a)(1)(A), Plaintiff Californians for Alternatives to Toxics discloses the
 25 name and the address and telephone number of each individual likely to have discoverable information
 26 that Plaintiff may use to support its claims. Plaintiff also identifies the subjects of information that may be
 27 in the possession of each person.

28 //

1 1. Patricia Clary, P.O. Box 1447, Hoopa,
2 CA, 95546. Ms. Clary can be reached
3 through counsel for Plaintiff.

4

5 2. Matt Lang. Mr. Lang can be reached
6 through counsel for Plaintiff.

7

8 2. Custodian of Records at San Francisco
9 Regional Water Quality Control Board,
10 1515 Clay Street, Suite 1400, Oakland,
11 CA 94612.

12

13 3. Custodian of Records at the State Water
14 Resources Control Board. 1001 I Street,
15 Sacramento, CA 95814.

16

17 Pursuant to F.R.C.P. 26(a)(1)(B), Plaintiff discloses the following descriptions by category of all
18 documents, data, and tangible things in Plaintiff's possession, custody or control that Plaintiff may use to
19 support its claims or defenses as follows:

20 1. Waste Discharge Requirement Order No. R2-2016-0031;

21 2. Defendants' annual reports and documents submitted pursuant to the monitoring and reporting
22 program for R2-2016-0031;

23 3. Documents Defendants have submitted to the Regional Water Quality Control Board;

24 4. Documents Defendants have submitted to the State Water Quality Control Board;

25 5. Regional Board Inspection Reports relating to Defendants' dairy facility;

26 6. Correspondence between Defendants and the Regional and State Water Boards relating to
27 Defendants' dairy facility;

28 7. Plaintiff's Notices of Intent to File Suit issued to Defendants;

29 8. Plaintiff's non-confidential investigation photographs, videos, and notations.

The above-listed documents are those reasonably available to Plaintiff at this time. Most, if not

1 all, of these documents are already in Defendants' possession.

2 Plaintiff's investigations are ongoing and, to the extent new, non-expert documents become
3 available that Plaintiff may use in this litigation, Plaintiff will promptly update these disclosures.
4

5 Dated: April 4, 2025

Respectfully Submitted,

6 LAW OFFICE OF WILLIAM CARLON
7

8 By: /s/ William N. Carlon

9 William N. Carlon

Attorney for Plaintiff

CALIFORNIANS FOR ALTERNATIVES TO TOXICS

PROOF OF SERVICE

I, William N. Carlon, declare as follows:

I am a resident of the State of California, and employed in Napa, California. I am over the age of 18 years and am not a party to the above-entitled action. My business address is 437 Post Street, Napa, California 94559.

On April 4, 2025, I served the following document(s):

PLAINTIFF'S INITIAL DISCLOSURES STATEMENT

by placing a true and correct copy thereof in a sealed envelope, with first-class postage prepaid and depositing it in a U.S. Postal Service mailbox, addressed to:

Peter Hsiao
Alexander Moore
KING & SPALDING LLP
50 California Street, Suite 3300
San Francisco, CA 94111

I declare under penalty of perjury that the foregoing is true and correct and that this declaration was executed on April 4, 2025, at Napa, California.


William N. Carlon

EXHIBIT H

PETER HSIAO (Bar No. 119881)
phsiao@kslaw.com
ALEXANDER MOORE (Bar No. 340994)
amoore@kslaw.com
KING & SPALDING LLP
50 California Street, Suite 3300
San Francisco, CA 94111
Telephone: +1 415 318-1200
Facsimile: +1 415 318 1300

6 *Attorneys for Defendants*
7 TRAVIS MOREDA DAIRY and TRAVIS
MOREDA

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA**

CALIFORNIANS FOR ALTERNATIVES TO TOXICS.

Plaintiff,

vs.

Defendants.

Case No. 3:24-CV-06632-SJ

**DEFENDANTS TRAVIS MOREDA
DAIRY AND TRAVIS MOREDA'S
INITIAL DISCLOSURES**

*Assigned for all purposes to the
Honorable Susan Illston*

1 Pursuant to Federal Rule of Civil Procedure 26, Defendants Travis Moreda
2 Dairy and Travis Moreda (collectively, "TMD") hereby submit the following initial
3 disclosures:

4 **RESERVATIONS**

5 1. These disclosures are based upon information reasonably available to
6 TMD as of this date. Continuing investigation and discovery may alter these
7 disclosures. Accordingly, TMD reserves the right to amend and/or supplement the
8 information disclosed below if additional information becomes available.

9 2. By making these disclosures, TMD does not represent that any
10 particular document exists within its possession, custody or control.

11 3. These initial disclosures are made without waiver of, or prejudice to,
12 any objections TMD may have. TMD expressly reserves all objections, including,
13 but not limited to, objections on the grounds of (a) relevance, (b) attorney-client
14 privilege, (c) the attorney work product doctrine, (d) any other applicable privilege
15 or protection under federal or applicable state law, (e) undue burden, (f)
16 immateriality, and (g) overbreadth.

17 4. TMD expressly reserves the right to identify and call as witnesses
18 additional persons other than those listed below, if, during the course of discovery
19 and investigation relating to this action, TMD learns that such additional persons
20 have knowledge of relevant matters.

21 5. These initial disclosures are made subject to and without limiting any
22 of the foregoing reservations.

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1 **I. Rule 26(a)(1)(A)(i): The name and, if known, the address and telephone**
 2 **number of each individual likely to have discoverable information—**
 3 **along with the subjects of that information—that the disclosing party**
 4 **may use to support its claims or defenses, unless solely for impeachment.**

5 TMD has not yet discovered all individuals who may have discoverable, non-
 6 privileged information that may support its defenses in this case. To date, TMD has
 7 identified the below-listed individuals:

#	Witness	Subject of Information	Contact Information
1	Travis Moreda	Travis Moreda Dairy and improvements to same; Travis Moreda Dairy's financial status.	c/o Primex's attorney
2	Stephanie Moreda-Arend	Travis Moreda Dairy and improvements to same; Travis Moreda Dairy's financial status; Northern California dairy industry.	c/o Primex's attorney
3	Kyle Lutz	The improvements to Travis Moreda Dairy; Clean Water Act and Regional and State and Water Board compliance; California dairy industry.	c/o Primex's attorney
4	Any and all persons identified in Plaintiff's Initial Disclosures.	Unknown at this time.	Unknown at this time.
5	Any and all persons whose depositions are noticed, taken, or who provide written testimony in this action.	Unknown at this time.	Unknown at this time.

24 **II. Rule 26(a)(1)(A)(ii): A copy—or a description by category and location—**
 25 **of all documents, electronically stored information, and tangible things**
 26 **that the disclosing party has in its possession, custody, or control and may**
 27 **use to support its claims and or defenses, unless the use would be solely**
 28 **for impeachment.**

29 The following categories of documents, electronically stored information, and

1 tangible things that TMD has in its possession, custody, or control may be used by
 2 TMD to support its claims and defenses, unless the use would be solely for
 3 impeachment, and are produced to Plaintiff on this date:

#	Categories of Documents and Tangible Things
1	Improvements made to Travis Moreda Dairy, including photographs and narrative descriptions.
2	The Travis Moreda Dairy Waste Management Plan, describing the dairy's ability to contain and hold all manure and water than has come in contact with manure, including, <i>inter alia</i> : (i) animal inventory; and (ii) storage pond design and usage calculations.
3	The Travis Moreda Dairy Nutrient Management Plan, evaluating the nutrients generated by the dairy and identifying practices to meet crop needs while minimizing adverse impacts to surface water and groundwater, including through, <i>inter alia</i> : (i) facility mapping; (ii) data regarding manure inventory, on-farm transfers, and applications; (iii) estimated manure nutrient analyses; (iv) planted crops and fertilizer recommendations; (v) planned nutrient applications; (vi) field and whole farm nutrient balances; (vii) crop land risk assessment; (viii) evaluation of manure and nutrient distribution; and (ix) evaluation of water source and backflow protections.
4	The San Francisco Bay Regional Water Quality Control Board Confined Animal Facility Compliance Inspection Report, dated November 1, 2024, finding, <i>inter alia</i> , that Travis Moreda Dairy meets General Waste Discharge Requirements, and identifying no violations.
5	Travis Moreda Dairy Profit & Loss Statements (produced under the terms of a confidentiality agreement between the parties).
6	Documents produced by Plaintiff in this action, subject to objections to their admissibility and foundation.
7	Documents produced by any non-party in this action.
8	Any item listed, disclosed, or endorsed by any party for use at trial.

25 TMD reserves the right to amend this list and identify further documents that
 26 may be used to support its defenses in this action as discovery progresses.
 27 //
 28

III. **Rule 26(a)(1)(A)(iii):** A computation of each category of damages claimed by the disclosing party—who must also make available for inspection and copying as under Rule 34 the documents or other evidentiary material, unless privileged or protected from disclosure, on which each computation is based, including materials bearing on the nature and extent of injuries suffered.

N/A.

IV. Rule 26(a)(1)(A)(iv): For inspection and copying as under Rule 34, any insurance agreement under which an insurance business may be liable to satisfy all or part of a possible judgment in the action or to indemnify and reimburse for payments made to satisfy the judgment.

None.

Dated: April 4, 2025

KING & SPALDING LLP

By: /s/ Alexander Moore
Alexander Moore

Attorneys for Defendants

CERTIFICATE OF SERVICE

I am a citizen of the United States and resident of the State of California. I am employed in the county of San Francisco, State of California. I am over the age of eighteen years and not a party to the within action. My business address is 50 California Street, Suite 3300, San Francisco, CA 94111.

On April 4, 2025, I served the following document(s) in the manner described below:

**DEFENDANTS TRAVIS MOREDA DAIRY AND TRAVIS
MOREDA'S INITIAL DISCLOSURES**

(BY ELECTRONIC SERVICE): By electronically transmitting a true and correct copy through King & Spalding LLP's electronic mail system to the email addresses set forth below based on an agreement by the parties.

(BY U.S. MAIL): I am personally and readily familiar with the business practice of King & Spalding LLP for collection and processing of correspondence for mailing with the United States Postal Service, and I caused such envelope(s) with postage thereon fully prepaid to be placed in the United States Postal Service at Sacramento, California.

<p>Brian Darwin Acree Law Office of Brian Acree 95 3rd Street, Second Floor San Francisco, CA 94103-3103 510-517-5196 Email: brian@brianacree.com</p>	<p>David Hutchings Williams Law Offices of David H. Williams 1839 Ygnacio Valley Road, Suite 351 Walnut Creek, CA 94610 510-847-2356 Fax: 925-332-0352 Email: dhwill7@gmail.com</p>
<p>William Leonard Verick Klamath Environmental Law Center 1125 Sixteenth Street, Suite 204 Arcata, CA 95521 707-630-5061 Fax: 707-630-5064 Email: wverick@igc.org</p>	<p>William Nazar Carlon Law Office of William Carlon 437 Post Street Napa, CA 94559 530-514-4115 Email: william@carlonlaw.com</p>

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on April 4, 2025, at Oakland, California.

/s/ Alexander Moore
Alexander Moore